

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

AMERICAN COUNCIL OF THE BLIND)	
OF INDIANA, et al.,)	
)	
Plaintiffs,)	Case No. 1:20-cv-3118-JMS-MJD
)	
v.)	
)	
INDIANA ELECTION COMMISSION, et)	
al.,)	
)	
Defendants.)	

JOINT REPORT ON THE STATUS OF DISCOVERY

The parties, by counsel, in accordance with the Court's Scheduling Order ECF no. 71, by and through their respective counsel, submit this joint status report on their progress in the case as follows:

I. A detailed description of all discovery completed within the preceding 28 days.

1. Defendants filed the data report required by the Court's Amended Preliminary Injunction (Doc. #106) on June 9, 2022.

II. A detailed description of all discovery presently scheduled or pending, including the due dates for any pending discovery requests and the scheduled dates for any depositions, and the identity of the counsel responsible for completing such discovery.

2. None currently. Liability discovery closed on April 8, 2022, Plaintiffs' expert disclosures for use at trial are due on August 19, 2022, and Defendants' expert disclosures for use at trial are due on September 19, 2022. All discovery must be completed by November 4, 2022.

II. A detailed description of any discovery disputes presently pending, including the status of the resolution of the dispute and the identity of the counsel responsible for resolving the dispute.

3. None currently.

III. A detailed description of all discovery that is planned to be completed within the 28-day period following this report including the identity of the counsel responsible for completing such discovery.

4. None currently.

IV. A detailed description of all known discovery remaining to be completed in this matter, including a proposed timetable for the completion of such discovery and the identity of the counsel responsible for completing such discovery.

5. None currently.

V. Any other discovery issues any party believes should be brought to the attention of the Court so as to avoid any further delays in the completion of discovery in this matter.

6. The Parties respectfully request that the Court postpone the filing of additional joint status reports until September 14, 2022, and determine the need for any subsequent reports at the status conference scheduled for September 21, 2022.

Date: June 13, 2022.

Respectfully submitted,

/s/ Samuel M. Adams

Thomas Crishon

Samuel M. Adams

INDIANA DISABILITY RIGHTS

4701 North Keystone Avenue, Suite 222

Indianapolis, Indiana 46205

Tel: (317) 722-5555

tcrishon@indianadisabilityrights.org

samadams@indianadisabilityrights.org

Stuart Seaborn

Rosa Lee Bichell

DISABILITY RIGHTS ADVOCATES

2001 Center Street, 4th Floor

Berkeley, CA 94704

Tel: (510) 665-8644
Fax: (510) 665-8511
sseaborn@dralegal.org
rbichell@dralegal.org

Christina Brandt-Young
DISABILITY RIGHTS ADVOCATES
655 Third Avenue, 14th Floor
New York, NY 10017
Tel: (212) 644-8644
Fax: (212) 644-8636
cbrandt-young@dralegal.org

Jelena Kolic
DISABILITY RIGHTS ADVOCATES
10 South LaSalle Street, 18th Floor
Chicago, IL 60613
jkolic@dralegal.org

Courtney L. Abshire
Atty. No. 35800-49
Deputy Attorney General
Office of Indiana Attorney General Todd Rokita
Indiana Government Center South, 5th Floor
302 W. Washington Street
Indianapolis, IN 46204-2770
Telephone: (317) 234-7019
Fax: (317) 232-7979
Email: courtney.abshire@atg.in.gov

Jefferson S. Garn
Atty. No. 29921-49
Deputy Attorney General
Office of Indiana Attorney General Todd Rokita Indiana
Government Center South, 5th Floor
302 W. Washington Street
Indianapolis, IN 46204-2770
Telephone: (317) 234-7119
Fax: (317) 232-7979
Email: jefferson.garn@atg.in.gov

